

COURTNEY M. GACCIONE, ESSEX COUNTY COUNSEL

By: Alan Ruddy, Esq., Assistant County Counsel

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Office of the Essex County Counsel

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(Attorney for Defendant, County of Essex, improperly pled as Essex County
Department of Corrections)

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
(NEWARK)**

Civil Action No.

Removed from:

:SUPERIOR COURT OF NEW JERSEY

:LAW DIVISION: ESSEX COUNTY

:DOCKET NO. ESX-L-000843-18

KERRI F. KELLERMAN, :

:

Plaintiff, : Civil Action

vs. :

ESSEX COUNTY DEPARTMENT
OF CORRECTIONS, et al. :

:

**NOTICE OF FILING PETITION
TO UNITED STATES DISTRICT
COURT FOR THE DISTRICT OF
NEW JERSEY FOR REMOVAL
28 U.S.C. §1446(d)**

Defendants. :

:

To: Clerk of the United States District Court
District of New Jersey
Martin Luther King, Jr., Courthouse
50 Walnut Street
Newark, NJ 07101

On Notice to: Clerk, Essex County Superior Court
Civil Law Division Filing
50 West Market Street, Rm. 131
Newark, NJ 07102

Kerri F. Kellerman
106 Harrison Street, Apt. 709
East Orange, NJ 07018

SIR/MADAM:

PLEASE TAKE NOTICE that the defendant, County of Essex, on this day of , 2018, filed a Notice of Removal, a copy of which is attached hereto, in the United States District Court for the District of New Jersey, to remove the above-captioned matter from the Superior Court of New Jersey, Essex County, to the United States District Court for the District Court of New Jersey.

You are also advised that the defendants, upon filing of said Notice of Removal, filed a copy of the Notice with all counsel of whom defendants have notice has filed pleadings in this case.

Courtney M. Gaccione
Essex County Counsel
(Attorney for defendant,
County of Essex)

s/Alan Ruddy
Alan Ruddy
Assistant County Counsel

Dated: March 21, 2018

CERTIFICATION OF SERVICE

I hereby certify that the original of the Notice of Petition to the Clerk of the United States District for the District of New Jersey for the Removal and the Notice of Removal were filed with Clerk of the United States District Court for the District of New Jersey, Newark Vicinage, and the Clerk of the Superior Court of New Jersey, Civil Division, and counsel of record within the time prescribed by the rules of Court.

s/Alan Ruddy
Alan Ruddy
Assistant County Counsel

Dated: March 21, 2018